Mr. Edinger;

The regulations contained in the "California Tank Vessel Escort Program for the Los Angeles / Long Beach Harbors" need revision. Specifically, the Force Selection Matrix[1] needs to be expanded upwards to include tanker displacements of 420,000 long tons. Also, the matrix as it applies to tank vessels with displacements over 260,000 tons needs to be reproven for water depths affording 10% under-keel clearance.

Recently completed channel deepening projects increased controlling water depths in both harbors and enabled our oil terminals to receive larger tank vessels. Some of these tank vessels have displacements above the upper end of California's existing force selection matrix for Los Angeles and Long Beach Harbors, which only covers tank vessels up to 340,000 displacement tons.

In addition, California's current matrix was originally proven with modeling based upon 20% under-keel clearance, which is inconsistent with our desired practice of allowing 10% under-keel clearance. Because tank vessels may behave differently with less under-keel clearance, some doubt exists that our current matrix matches adequate tug pulling power for tank vessels operating in water depths affording less than 20% under-keel clearance.[2]

The Los Angeles Long Beach Harbor Safety Committee requests a revision to the California regulations. The committee recommends that we use certified simulation to extend and reprove the existing Force Selection Matrix as described in the enclosed proposal document. The committee also requests that the California Office of Spill Prevention and Response provide funding to complete the simulation study as needed to support the new rulemaking. This project should be completed prior to the end of the third quarter of 2010.

Sincerely,

Captain John Strong, Chairman
Los Angeles Long Beach Harbor Safety Committee

Enc.

[1] See Title 14, California Code of Regulations, §851.27

[2] Harbor depths afford at least 20% under-keel clearances for all tank vessels except those tank vessels with displacement over 260,000 long tons.